



April 20, 2005

Byron Zuidema
Regional Administrator
U.S. Department of Labor
230 South Dearborn Street
Chicago, Illinois 60604

Dear Byron:

The Minnesota Department of Employment and Economic Development (DEED) requests permission from the U.S. Department of Labor (DOL) to allow out-of-school youth to take advantage of Individualized Training Accounts (ITAs) without co-enrolling in the WIA Adult program.

Specific Waiver Request:

Permit Individual Training Accounts (ITAs) to be used for older youth and out-of-school youth under Minnesota's WIA Youth Formula Grant.

Specific Statutory/Regulatory Requirement to be Waived:

WIA Final Rule 664.510

Objective:

The waiver is designed to enhance customer choice, allow older youth and out-of-school youth to benefit from services provided by Minnesota's certified training providers, and expand services without requiring local program operators to register participants in the adult program and track resources separately for each funding stream.

Principles:

Granting this waiver request will increase efficiency and choices for customers who can potentially benefit from the expanded services offered. Without a waiver, ITAs are not permitted for youth participants.

**Department of Employment and Economic Development
Workforce Partnerships Division**

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Anticipated Benefits:

- * Program operators will be able to provide additional services to out-of-school youth without having to go through the duplicative burden of registering for the adult program.
- * Granting this waiver would alleviate the need to track expenditures separately for each funding stream.
- * The allowable service(s) would remain consistent with established policies for adults. Requiring additional registration adds no value to the program or the customer.

Monitoring/Evaluation of Impact of Proposed Waiver:

Minnesota will monitor implementation and impact of the waiver through a combination of reporting from the local level and state oversight and evaluation. Through meetings of the Local Workforce Investment Board Directors and local youth practitioners, DEED will seek feedback on use, problems, and successes associated with the implementation of this waiver request. These discussions will allow sharing of best practices in taking the greatest advantage of opportunities offered by the waiver. DEED will also include monitoring of use of the waiver in its routine desk reviews and on-site monitoring.

If you have questions regarding this waiver request, please contact Kay Tracy, Director of Community-Based Services, at 651-296-6064 or kay.tracy@state.mn.us. Thank you for your consideration of this issue.

Sincerely,

Erik Aamoth
Director
Workforce Partnership Division

c: Lori Crockett-Harris, DOL
 Jim Sawers, DOL
 Kay Tracy, Director (CBS)
 Catherine Brooks, DOL